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Attorneys for Defendant Wells Fargo Bank, N.A.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LILY TOUCHSTONE, LLC, a domestic limited liability company,

Plaintiff,

v.

NATIONAL DEFAULT SERVICING CORPORATION, an Arizona corporation; WELLS FARGO BANK, N.A.; and DOES 1-5 inclusive,

Defendants.

CASE NO.: 2:18-cv-02283-GMN-NJK

**STIPULATION AND ORDER TO
EXTEND DEFENDANT WELLS
FARGO BANK, N.A.'S TIME TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

(FIRST REQUEST)

It is hereby stipulated by and between Plaintiff Lily Touchstone, LLC ("Plaintiff"), through its counsel, Mont E. Tanner, Esq., and Defendant Wells Fargo Bank, N.A. ("Wells Fargo"), through its counsel, the law firm of Snell & Wilmer L.L.P., as follows:

The deadline for Wells Fargo to answer or otherwise respond to the Complaint is currently December 7, 2018. Plaintiff and Wells Fargo stipulate and agree that Wells Fargo may have a fourteen (14) day extension, up to and including December 21, 2018, to respond to Plaintiff's Complaint. In support of this Stipulation, the Parties state as follows:

1. On October 29, 2018, Plaintiff filed a Complaint ("Complaint") in the Eighth Judicial District Court, Clark County, Nevada, Case No. A-18-783569-C. Plaintiff faxed a copy of

the Complaint to Wells Fargo's foreclosure trustee, National Default Servicing Corporation, on October 31, 2018.

2. Although Plaintiff failed to properly serve Wells Fargo, Wells Fargo timely filed a Petition for Removal [ECF No. 1] in the United States District Court, District of Nevada, on November 30, 2018.

3. Wells Fargo filed a Notice of Removed Action in the Eighth Judicial District Court, Clark County, Nevada, Case No. A-18-783569-C, on November 30, 2018.

4. This is the first request for an extension of time to respond to the Complaint and is not intended to cause any delay or prejudice to any party. Rather, the Parties request this extension to allow Wells Fargo to evaluate and analyze the Complaint, conduct a diligent search, and obtain records and information necessary to prepare its responsive pleading.

5. The Parties respectfully request that the Court enter an order allowing Wells Fargo to respond to the Complaint on or before December 21, 2018.

IT IS SO STIPULATED.

DATED this 4th day of December 2018.

LAW OFFICES OF MONT E. TANNER

/s/ Mont E. Tanner

Mont E. Tanner (NV Bar No. 4433)
2950 East Flamingo Road, Suite G
Las Vegas, NV 89121
Phone: (702) 369-9614
Fax: (702) 369-5731

Attorney for Plaintiff

DATED this 4th day of December 2018.

SNELL & WILMER L.L.P.

/s/ Jennifer L. McBee

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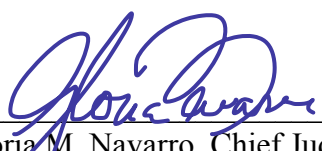
ORDER

IT IS HEREBY ORDERED:

1. That the foregoing Stipulation by and between the Parties is approved; and
2. That Wells Fargo shall have until December 21, 2018 to respond to Plaintiff's Complaint in this matter.

IT IS SO ORDERED.

DATED this 12 day of December, 2018.



Gloria M. Navarro, Chief Judge
United States District Court

Respectfully submitted by:

SNELL & WILMER L.L.P.

/s/ Jennifer L. McBee

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Atto ne s or De endant Wells Far o Bank, N.A.

CERTIFICATE OF SERVICE

I hereby certify that on December 4, 2018, I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND DEFENDANT WELLS FARGO BANK, N.A.'s TIME TO RESPOND TO PLAINTIFF'S COMPLAINT** with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

I further certify that I have sent the foregoing document to the Plaintiff's counsel, Mont E. Tanner, Esq., by First-Class Mail, postage fully prepaid, to the following street address:

Mont E. Tanner, Esq.
LAW OFFICES OF MONT E TANNER
2950 East Flamingo Road, Suite G
Las Vegas, NV 89121

Attorney for Plaintiff

DATED this 4th day of December 2018.


An Employee of Snell & Wilmer L.L.P.